

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
Greenbelt Division

IN RE:

ANTHONY D PEARSON, SR.

Debtor

Chapter 13

Case No. 20-19673-TJC

WELLS FARGO BANK, NATIONAL  
ASSOCIATION, AS TRUSTEE FOR  
STRUCTURED ASSET MORTGAGE  
INVESTMENTS II INC., BEAR STEARNS  
MORTGAGE FUNDING TRUST 2006-AR1,  
MORTGAGE PASS-THROUGH  
CERTIFICATES, SERIES 2006-AR1

Movant

v.

ANTHONY D PEARSON, SR.  
1122 BLUEWING TERR  
UPPER MARLBORO, MD 20774  
(Debtor)

KELLY M. PEARSON  
1122 BLUE WING TERRACE  
UPPER MARLBORO, MD 20774  
(Co-Debtor)

REBECCA A. HERR  
185 ADMIRAL COCHRANE DR., SUITE  
240  
ANNAPOLIS, MD 21401  
(Trustee)

Respondents

**OPPOSITION TO THE MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-  
DEBTOR AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 1301(c)(3)**

Anthony D. Pearson, Sr. (“Debtor”) and Kelly M. Pearson (“Co-Debtor”) by undersigned counsel, respectfully oppose the termination of the Automatic Stay and Co-Debtor Automatic Stay as to the real property located at 1122 Blue Wing Terrace, Upper Marlboro, MD 20774 (“Property”), and, as grounds therefore, states as follows:

1. Debtor neither admits nor denies the allegations stated in Paragraph 1.
2. Debtor admits the allegations stated in Paragraph 2.
3. Debtor admits the allegations stated Paragraph 3.
4. Debtor admits the allegations stated Paragraph 4.
5. Debtor admits the allegations stated Paragraph 5.
6. Debtor admits the allegations stated Paragraph 6.
7. Debtor neither admits nor denies the allegations stated in Paragraph 7 and calls upon Movant to prove same.
8. Debtor neither admits nor denies the allegations stated in Paragraph 8 and calls upon Movant to prove same.
9. Debtor denies the allegations stated in Paragraph 9.
10. Debtor denies the allegations stated in Paragraph 10.
11. Debtor neither admits nor denies the allegations stated in Paragraph 11 and calls upon Movant to prove same.
12. Debtor denies the allegations stated in Paragraph 12.
13. Debtor denies the allegations stated in Paragraph 13.
14. Debtor denies the allegations stated in Paragraph 14.
15. Debtor denies the allegations stated in Paragraph 15.
16. Debtor neither admits nor denies the allegations stated in Paragraph 16.
17. Debtor denies the allegations stated in Paragraph 17.
18. Debtor denies the allegations stated in Paragraph 18.
19. The Debtor made a mortgage payment for the month of December 2020. Movant intentionally credited this payment to the month of October 2020 and this payment is now being held in suspense. The Debtor demands that no late fee be applied for this payment.

WHEREFORE, the Debtor respectfully request that this Court deny the Motion for Relief of Wells Fargo Bank, National Association, as Trustee for Structured Asset Mortgage Investments II Inc., Bear Stearns Mortgage Funding Trust 2006-AR1, Mortgage Pass-Through Certificates, Series 2006-AR1 and requests that this court grants such other and further relief as is just and proper.

Date: January 25, 2021

Respectfully submitted,

/s/ Jillian M. Kindlund  
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**CERTIFICATE OF SERVICE**

The undersigned states that on January 25, 2021 copies of the foregoing Opposition to the Motion for Relief from Automatic Stay and Co-Debtor Automatic Stay were sent via US Mail postage prepaid or via ECF to the following:

Rebecca A. Herr  
185 Admiral Cochrane Dr., Suite 240  
Annapolis, MD 21401 [ecf@ch13md.com](mailto:ecf@ch13md.com)  
*Bankruptcy Trustee*

Movant  
James E. Clarke, Bar #15153  
John E. Tarburton, Bar #26398  
Paul J. Moran, Bar #19595  
Orlans PC  
PO Box 2548  
Leesburg, VA 20177

/s/ Jillian M. Kindlund  
Jillian M. Kindlund, 17613